



December 16, 2022

Via Pacer

Honorable Sean H. Lane
US Bankruptcy Court for SDNY
300 Quarropas Street
White Plains, New York 10601-4140

Re: Debtor: Blitman Saratoga LLC
Chapter 11
Case No. 20-23177 (RDD)
My Client: Stephen and Susan Dorsey

Dear Judge Lane:

I represent Stephen and Susan Dorsey (“Dorseys”). The Dorseys have a motion that is currently returnable on December 20, 2022. The deadline for responses to the motion was December 13, 2022. The only response to the motion was filed by Frank Brennan, Esq., the attorney representing the unsecured creditors’ committee.

The Dorseys and the Debtor have recently settled their disputes, pursuant to the terms set forth in the accompanying Stipulation. Ideally, the Debtor would promptly file the attached stipulation, along with a motion to approve it pursuant to Rule 9019. Unfortunately, the Debtor’s counsel are in the process of moving their office and are unable to promptly file the attached stipulation and a 9019 motion. Accordingly, I am hereby respectfully requesting to adjourn the Dorseys’ motion until the end of January, which should give the Debtor sufficient time to file a 9019 motion to approve the accompanying Stipulation. Mr. Brennan has consented to my request to adjourn the Dorseys’ motion until the end of January.

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I look forward to hearing whether the court will adjourn the Dorseys' motion until the end of January. Thank you for your attention to this matter.

Respectfully submitted,

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O'CONNELL AND ARONOWITZ



Kevin Laurillard

cc:
other attorneys and parties
via Pacer